

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

BRIAN BOWEN II,

PLAINTIFF,

v.

NO. 3:18-CV-3118-JFA

ADIDAS AMERICA, INC.;  
JAMES GATTO; MERL CODE;  
CHRISTIAN DAWKINS; MUNISH  
SOOD; THOMAS GASSNOLA; and  
CHRISTOPHER RIVERS,

DEFENDANTS.

I, William H. Taft V, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of eighteen and have personal knowledge of the matters set forth below, which are true and correct to the best of my knowledge and belief.

2. I am an attorney with the law firm of Debevoise & Plimpton, LLP, 919 Third Avenue, New York, NY 10022. I am one of the attorneys representing Defendant adidas America Inc. (“adidas”) in this action. I am licensed to practice law by the State of New York and am admitted *pro hac vice* to practice law in the United States District Court for the District of South Carolina.

3. I make this Declaration in support of Defendant adidas’s Motion to Dismiss the Amended Complaint.

4. Attached hereto as Attachment 1 is a true and correct copy of a tweet from the Twitter account @LouisvilleMBB dated November 22, 2017, that is available at <https://twitter.com/LouisvilleMBB/status/933360462649012225>, as last accessed on September 19, 2019.

5. Attached hereto as Attachment 2 is a redline comparison of Plaintiff Bowen's Amended Complaint as compared to his original Complaint.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 20th day of September 2019 in New York, New York.

By: /s/ William H. Taft V  
William H. Taft V

**CERTIFICATE OF SERVICE**

I hereby certify that on September 20, 2019, I served the foregoing document on all counsel of record through CM/ECF.

/s/ Matthew T. Richardson  
*Counsel for Defendant adidas America, Inc.*